

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20CR00345 JAR PLC
)	
CAMERON STEPNEY,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and J. Christian Goeke, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with attempted bank larceny, in violation of Title 18, United States Code, Section 2113(b) for which offense for which an offense for which a maximum 10-year imprisonment is prescribed under Title 18.
2. According to St. Louis Metropolitan Police Department (SLMPD) complaint number 20-023340, on June 2, 2020, officers with the St. Louis Metropolitan Police Department (SLMPD) Bicycle Response Team (BRT) while patrolling downtown area due to large scale civil unrest were advised by the Real Time Crime Center (RTCC) that a group of approximately six individuals were at the US Bank located at 301 N. Tucker attempting to pry open the door of an ATM at that location. In addition, RTCC advised that an individual wearing a black shirt and red pants was actively prying on the ATM door. As BRT officers approached US Bank, all subjects at the ATM fled the area on foot in different directions. A BRT officer observed

Defendant, who was wearing a black shirt and red pants, fleeing from the ATM towards Tucker Blvd. and gave chase while identifying himself as a police officer and ordering Defendant to stop. Defendant ignored the officers orders and continued to flee down Tucker for approximately one block at which time the officer was able to catch up to Defendant and attempt to take him into custody. Defendant resisted arrest, striking officers with his elbows, until he was finally restrained.

3. The defendant's criminal history, including a pending case for Robbery 2nd in the Circuit Court of St. Charles County under cause number 2011CR02549 for events occurring on May 26, 2020, and the nature and circumstances of the offense charged, which included fleeing from police and resisting arrest resulting in injuries to officers, reflects that there is a serious danger to the community that would be posed by the defendant's release.

4. Due to the weight of the evidence against defendant and defendant's criminal history and characteristics, there is a serious risk that the defendant will flee.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ J. Christian Goeke
J. CHRISTIAN GOEKE, #39462(MO)
Assistant United States Attorney